

### **REMARKS/ARGUMENTS**

Applicants request reconsideration of the rejections in the Action, based on the following remarks.

Claims 1-9 and 16-24 are pending in the application. Claim 22 has been amended to fix a minor typographical error. Claims 1 and 21 are the only independent claims. Each of claims 2-9 directly or indirectly depend from claim 1, and each of claims 22-24 directly or indirectly depend from claim 21.

#### **Rejections under 35 U.S.C. § 102(b)**

Claims 1-9 and 16-24 are rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 5,924,094 to Sutter ("Sutter"). Applicants traverse, at least because, as recited in each of claims 1 and 21, Sutter does not describe a method for altering encryption status in a database comprising:

providing a table in said database, said table including a maintenance area and a base area, said base area including a first set of records;

copying said first set of records from said base area to said maintenance area, thereby creating, in said maintenance area, a second set of records;

while altering encryption status of said base area and in response to a user instruction to modify data in a record in said first set of records, modifying data in a record in said second set of records in said maintenance area instead of modifying data in any record in said first set of records in said base area; and

after altering encryption status of said base area, copying said second set of records in said maintenance area to said base area to replace said first set of records, thereby creating in said base area a third set of records.

Sutter describes an Independent Distributed Database System (IDDS) in which a subset of an organization's database is distributed among various sites of the organization based on the data requirements of users working at the sites (see Sutter, col. 9, ll. 5-15). Sutter describes the IDDS as including two types of sites: (1) stable sites, which are those with high availability such as the head office site, and (2) transient sites, which are those with intermittent availability, including home and mobile user sites (Id., col. 11, ll. 6-19). Sutter further describes that stable sites can contain the organization's entire database, whereas transient sites contain a subset of the database required for an application of the organization (see Sutter, col. 10, ll. 8-11). The application of the organization can be related to a particular activity of the organization such as projects affiliated with a customer of the organization (col. 10, starting at ll. 47 through col. 11, ll. 5). Each application includes a group of users who work offline on a local copy of the database at an application site. The database includes the subset of the organization's database required to support only the application activity, for example, Project A for Customer XYZ (see Sutter, col. 14, ll. 39-40, and col. 74, ll. 39-43).

Moreover, Sutter defines spine and non-spine sites for replicating databases and propagating user modifications to local copies of the database to other application sites (see Sutter, col. 14, starting at ll. 33). Generally, depending on the configuration of the IDDS, the spine sites are the stable sites and non-spine sites are the transient sites described above. Application sites communicate with each other to obtain copies of the data and to perform "database sync" operations to propagate local modifications to other sites (see Sutter, col. 14, ll. 62 through col. 15, ll. 21).

Sutter does not describe "providing a table in said database, said table including a maintenance area and a base area, said base area including a first set of records." Instead, Sutter describes transferring updated database records from a local site database to other application sites databases, such as those for the spine and non-spine sites. It appears that the Examiner believes that any two copies of the application database at different application sites of the IDDS application network is the same as "a table in the database including a maintenance area and a base area" as in claims 1 and

21. However, it is clear that Sutter describes databases at each IDDS application site, not a table with a maintenance area and a base area. Thus, Sutter does not describe “providing a table in said database, said table including a maintenance area and a base area, said base area including a first set of records.”

Moreover, Sutter does not describe “copying said first set of records from said base area [in the table] to said maintenance area [in the table]” as recited in claims 1 and 21. Instead, Sutter describes an “update propagation procedure” involving a “database sync” operation in which the IDDS determines the record fragments in each local site copy of the database and then transmits only updated, i.e. more recent, fragments to local copies of the database at other application sites in order to synchronize every single local copy of the database for the application (see col. 15, ll. 13-26). Clearly, propagating and updating record fragments between separate databases is different that copying data between a maintenance area and a base area of a single table.

Furthermore, Sutter does not describe “while altering encryption status of said base area and in response to a user instruction to modify data in a record in said first set of records, modifying data in a record in said second set of records in said maintenance area instead of modifying data in any record in said first set of records in said base area” as in claims 1 and 21. Although Sutter may describe encryption of the data for security purposes (see, for example, FIG. 21), it does not describe altering encryption status of a base area in a table. Furthermore, Sutter does not describe, while altering encryption status and in response to a user instruction to modify data in a base area, modifying data in a maintenance area of the table. Instead, as discussed above, Sutter describes each user modifying data only in the local copy of the database at the local site and then synchronizing any modifications to other local copies of the database.

Furthermore, Sutter does not describe while altering encryption status, responding to a user instruction by modifying data in one area instead modifying data in another area. The database sync operation, for example, does not describe altering encryption

status of any of the data. Moreover, the database sync operation does not describe while altering encryption status in a database and in response to a user instruction to modify data in the database, directing modification of data in the database to another database, since local modifications to any of the application site databases can continue throughout the sync operation.

Furthermore, Sutter does not describe “after altering encryption status of said base area, copying said second set of records in said maintenance area to said base area to replace said first set of records, thereby creating in said base area a third set of records” as in claims 1 and 21. Instead, Sutter merely describes propagating and updating data between local copies of the database at each application site.

Thus, Applicants submit that Sutter does not teach or suggest all the limitations of each of claims 1 and 21. In fact, Sutter could not be used to achieve any aspect of claims 1 and 21 since the primary purpose of Sutter is to minimize security risks and bottlenecks from data transmission over the network by operating on local copies of data and only periodically updating copies of the database at the application sites. Thus, Sutter could not be used to alter encryption status of a base area in a table using the method recited in each of claims 1 and 21. Therefore, Applicants submit that each of claims 1 and 21 are patentable. Furthermore, because each of claims 2-9 contains all the limitations of claim 1, and each of claims 22-24 contains all the limitations of claim 21, these claims are allowable for at least the same reasons.

**CONCLUSION**

In view of the above remarks, Applicants believe the pending application is in condition for allowance.

Dated: June 27, 2007

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